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Before the  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Advanced Television Systems  
and Their Impact Upon the  
Existing Television Service

MM Docket No. 87-268

To: The Commission

**Comments of  
National Public Radio, Inc.**

National Public Radio, Inc. ("NPR") hereby submits its response to the November 20, 1997 *ex parte* filing of the Association for Maximum Service Broadcasters, Inc. and other broadcasters ("MSTV") in the above-captioned proceeding. See Public Notice, MM Docket 87-268, December 2, 1997.

NPR is a non-profit membership organization of more than 590 noncommercial educational radio stations. In addition to producing and distributing such programming as *Morning Edition*, *All Things Considered*, *Talk of the Nation*, and *Performance Today*, NPR manages the Public Radio Satellite Interconnection System and represents the interests of its membership before Congress and this and other Federal agencies.

In suggesting certain modifications to the Table of Allotments for digital television ("DTV") adopted in the Sixth Report and Order in this proceeding,<sup>1</sup> MSTV has, once again, failed to address

<sup>1</sup> Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268 (rel. Apr. 21, 1997).

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the issue of interference between DTV channel 6 operations and adjacent channel noncommercial educational radio broadcasters operating on the reserved FM frequency. Accordingly, whatever the Commission may conclude regarding the problems MSTV's submission seeks to redress, it should not adopt MSTV's suggested changes to the DTV Table of Allotments as a potential solution to those problems.

As the Commission is undoubtedly familiar from the record in this proceeding, adjacent channel interference to and from DTV channel 6 threatens to undermine public radio service in this country and materially impair the operations of DTV channel 6 stations -- both those stations allotted DTV channel 6 during the transition and those current analog TV channel 6 stations that may be permitted to utilize DTV channel 6 after the transition.<sup>2</sup> There is no need to restate the relevant technical and policy considerations here. It is important to note, however, that MSTV's November 20, 1997 *ex parte* filing does not remedy the Commission's unwarranted and inappropriate reliance on DTV channel 6 both in its Table of Allotments and its post-transition DTV plans.<sup>3</sup> Indeed, MSTV's suggested improvements do not appear to reduce any of the potential DTV channel 6 allotments.<sup>4</sup>

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<sup>2</sup> See Opposition of National Public Radio, Inc. To Petitions for Reconsideration Of The Fifth And Sixth Reports and Orders, MM Docket No. 87-268, filed July 18, 1997; Petition for Reconsideration of National Public Radio, Inc., MM Docket No. 87-268, filed June 13, 1997; Reply Comments of National Public Radio, Inc., MM Docket No. 87-268, filed Dec. 23, 1996; see also Petition For Reconsideration of Fox Television Stations, Inc., MM Docket No. 87-268, filed June 12, 1997.

<sup>3</sup> See Petition for Reconsideration of National Public Radio, Inc., MM Docket No. 87-268, at 4-10.

<sup>4</sup> While MSTV's specific channel changes to the DTV Table indicate that WTTG, Washington, D.C. would operate on DTV channel 59 rather than DTV channel 6, as set forth in the Commission's Table of Allotments, its coverage and (DTV-to-DTV) interference figures indicate

Therefore, because the Commission's Table of Allotments is fundamentally flawed in its reliance on DTV channel 6, and MSTV's *ex parte* filing does not ameliorate those flaws, MSTV's suggested changes are of limited, if any, value. Indeed, even as to current or future individual channel allotments that do not directly implicate the DTV channel 6 or other interference issues, adopting a change that MSTV has proposed in one market may limit the changes that potentially may be made elsewhere. Accordingly, nothing short of a comprehensive revision to the Table of Allotments that addresses all of its fundamental problems, including the issue of adjacent DTV channel 6 interference, is required.

Respectfully submitted,



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December 17, 1997

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that no such change is proposed. Compare MSTV Ex Parte Submission, Exhibit 1A, at 8, with id., Exhibit 1B, at 8.

## CERTIFICATE OF SERVICE

I, Gregory A. Lewis, hereby certify that a copy of the foregoing Comments of National Public Radio, Inc. was sent this 17<sup>th</sup> day of December, 1997, by first class mail, postage prepaid to the following:

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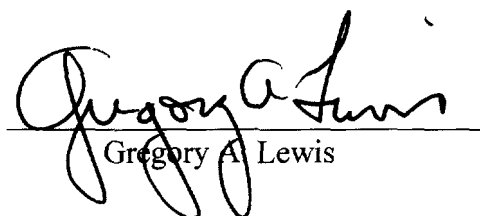
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